IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

EDWINA GAMBLE , individually,)
as personal representative of the)
Estate of Julia Mae Thornton, and)
on behalf those similarly situated)
)
Plaintiff,)
v.) CASE NO: 2:14-CV-00231-AKK
)
OCWEN LOAN SERVICING, LLC.)
HSBC BANK USA, N.A.; and)
Fictitious Defendants A-W,)
)
Defendant.)

JOINT MOTION FOR EXTENSION OF TIME TO EXCHANGE EXPERT REPORTS

COME NOW Plaintiff Edwina Thornton Gamble ("Plaintiff") and Defendant Ocwen Loan Servicing, LLC, et al. ("Defendant"), by and through their undersigned counsel, and move this Court to enter an Order extending the October 28, 2014 deadline on which Plaintiff must file her retained expert reports and extending the November 3, 2014 deadline on which Defendant must file its retained expert reports for a period of twenty-one days (21) days. As grounds for this Motion, the Plaintiff and Defendant state as follows:

1. On June 20, 2014, this Court entered a Scheduling Order [Doc. 10] in this matter setting October 28, 2014 as the deadline for Plaintiff to file her retained expert

reports and setting November 28, 2014 as the deadline for Defendant to file its retained

expert reports.

2. Since that time, Counsel for the parties have been in settlement discussions

to try to reach a potential resolution in this matter and engaged in initial discovery efforts.

Counsel for the parties need additional time to possibly reach a resolution in this matter

before conducting an inspection of the home made the basis of Plaintiff's claims and

exchanging retained expert reports.

3. This request for a twenty-one (21) day extension to exchange expert reports

will not affect any other deadlines set in this Court's June 20, 2014 Scheduling Order.

WHEREFORE, premises considered, Plaintiff and Defendant respectfully request

that this Court enter an Order extending the October 28, 2014 deadline for Plaintiff to

submit a retained expert report and extending the November 28, 2014 deadline for

Defendant to submit its Expert report for a period of twenty-one (21) days.

Respectfully submitted,

/s/ James A. Stewart

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/s/ D. Keith Andress
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Attorney for Defendants Ocwen Loan Servicing, LLC and HSBC Bank USA N.A., as Indenture Trustee for the registered Noteholders of Renaissance Home Equity Loan Trust 2005-4, Renaissance Home Equity Loan Asset-Backed Notes, Series 2005-4

CERTIFICATE OF SERVICE

I hereby certify that a copy of this has been served upon the following by United States mail, first class postage prepaid and properly addressed, by facsimile or by Electronic Filing with notice of case activity sent electronically on this the 27th day of October, 2014.

/s/ James A. Stewart
OF COUNSEL

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